

Application No. 09/683,240

1.A Reliance On Goodisman As A Reference

Because the Office Action continues to rely on paragraphs disclosed in the Goodisman Application filed October 3, 2001, and not solely on disclosure in the Goodisman Provisional filed November 17, 2000, Applicant continues to maintain that those paragraphs of Goodisman Application cited in the Office Action may not be relied on as a 102/103 reference as they relate to the disclosure of its perfected filing not disclosed in its provisional filing (filed November 17, 2000), where the Goodisman Application was filed October 3, 2001 after the provisional application filed August 13, 2001 by Applicant to which the instant Application filed December 5, 2001 claims priority.

More specifically, Applicant submits that of *section C* which describes the claimed subject matter (paragraphs 0156-0204) in Applicant's perfected application filed December 5, 2001, only the following paragraph (and identified contents) are not disclosed in the Provisional Application No. 60/311,857, filed August 13, 2001, to which the instant application claims priority: 0180 (entire paragraph), 0182 ("or suggested"), 0183 ("or the time and/or date at which the suggestion is made") and 0185 (entire paragraph). Applicant therefore maintains that the claimed invention is fully supported by Applicant's Provisional Application filed August 13, 2001.

1.B Rejection of Independent Claims 1, 10 and 19

In rejecting independent claim 1 the Office Action, on pages 2-3, asserts sections of Horowitz (col. 5, lines 56-54; col. 9, lines 1-63, col. 10, lines 8-27; col. 11, lines 24-52) and Goodisman Application (paragraphs 0006-0007 and 0024-0027) render Applicant's claim invention recited in independent claims 1, 9, and 12 unpatentable.

Generally, Horowitz discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between the terms in the source document and target documents. (See Horowitz

Application No. 09/683,240

Abstract.)

Generally, Goodisman Provisional discloses a method for integrating wireless web/internet with java-based application servers. A context-sensitive engine that can be used to deliver reports on email message content, an auto-link generator to parse text to look for relevant links, and an auto-abbreviator to automatically compress text based on wireless device parameters (see Goodisman Provisional, pages 6, lines 19-21 and page 24 lines 7-13).

More specifically, the cited sections in the Office Action of Horowitz disclose: (a) an implementation of a knowledge base in which topics and terms are stored in a topic-term table, where each topic in the knowledge base may have a unique ID code for cross-referencing in other tables (see Horowitz col. 5, lines 56-54); (b) unified noun phrases and nouns are selected based on frequency of occurrence and tagged using a knowledge base (see Horowitz col. 9, lines 1-63); (c) a process of generating links to target documents by looking up topics for each tag and linking documents associated with the topic to the term in the tag (see Horowitz col. 10, lines 8-27); (d) a server that is adapted to pass user selected portions of a page to a tagging module which generates tags for the selected portion (see Horowitz col. 11, lines 24-52).

The cited sections of the Goodisman Application are not believed to have been disclosed in Goodisman Provisional and therefore are not believed to be 102/103 prior art references for Applicant's claimed invention recited in claims 1, 9, and 12 for those reasons set forth above in section 1.A. Applicant thus assumes that for the purpose of responding to the rejection of claims 1, 10, and 19, are rejected generally in view of Goodisman Provisional as summarized above.

In contrast, Applicant's invention recited in independent claim 1, 10, and 19 set forth, respectively, a method, apparatus and article of manufacture therefor, for enriching documents by invoking a print command from a print client interface (as shown in Figures 8 and 9) that allows selection of print property settings and properties of a document service request (see reference number 802). Further, Applicant's claimed invention recited in independent claims 1, 10, and 19 recites the *enrichment of document content at an insertion point that identifies a processing stage in printing the document content* (see reference number 906 in Figure 9).

Application No. 09/683,240

which document content is defined by a document property included in the document service request (see reference number 808 in Figure 8) and annotated according to the enrichment theme of the personality identified by a personality identifier (see reference numbers 804 and 806) included in an enrichment property of the document service request.

That is, Horowitz that discloses a method for creating contextual hyperlinks in a text document, as described above, and Goodisman Provisional that discloses a method for integrating wireless web/internet with java-based application servers, as described above, fail to disclose or suggest whether taken singly or in combination Applicant's method, article of manufacture and apparatus therefore, recited in claims 1, 10, and 19 that includes *a print client interface for invoking a print command* that allows selection of print property settings and properties of a document service request, *where the document service request includes at least one document property and one enrichment property*, and that recites a meta-document server that enriches document content at an insertion point, *where the insertion point identifies a processing stage of the print command invoked from the print client interface*.

1.C Summary

In view of the arguments presented above, Applicant respectfully submits that independent claims 1, 10, and 19 as are patentably distinguishable over Horowitz taken singly or in combination with Goodisman.

Insofar as claims 2-6, 11-15, and 20 are concerned, these claims depend from one of now presumably allowable independent claims 1, 10, and 19 and are also believed to be in allowable condition.

In so far as claims 7 and 16 are concerned, the Office Action on pages 4-5 rejects claims 7 and 16 under 35 USC 103(a) as being unpatentable over Horowitz in view of Goodisman as applied to claims 1 and 10, and further In view of Keith JR, U.S. Patent Application Publication 2002/0032672, and in so far as claims 8, 9, 17, and 18 are concerned, the Office Action on pages 5-6, rejects claims 8, 9, 17, and 18 under 35 USC 103(a) as being unpatentable over Horowitz in view of Goodisman as applied to claims 1 and 10, and further in view of Nehab et al., U.S. Patent 6,029,182. There is no need to specifically address the merits of the rejection of claims 7-9 and 16-18 because they depend from one of claims 1 and 10 which are

Application No. 09/683,240

clearly patentable for the reasons set forth above.

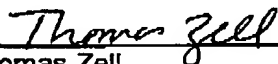
2. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this amendment or response, however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the Issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

3. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,


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